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BY ECF

July 23, 2025

Honorable Judge Lee G. Dunst United States District Court, EDNY 100 Federal Plaza Central Islip, New York 11722

Re:

William F. Hasper v. County of Nassau, et. al

Case No.: 20-cv-02349 (RER) (LGD)

Dear Magistrate Dunst:

Kindly accept this discovery status letter on behalf of the parties.

Since our last report dated June 24, 2025, we have completed two depositions of party defendants and have exchanged various items of discovery not previously disclosed. We have two remaining defendants, in addition to two non-party witnesses, to depose.

The parties request that the deposition of defendant William Russell be held in abeyance until the parties obtain Russell's personal cell phone records from Verizon. Those records previously provided by the Nassau County District Attorney's office contained numerous redacted call numbers. Both parties desire to obtain unreacted copies of those records. Numerous requests made by the defense to the DA's office for the unredacted copies have been unsuccessful.

To that end, we kindly request that Russell's deposition be held in abeyance and his personal cellular records be obtained from Verizon by a "So Ordered" subpoena from the Court. Kindly inform us if you will approve this request. Thank you.

ANTHON M. LA PINTA

vour

AML/alp

Very truly

John Carnevale, Esq.